

U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION/SITUATION REPORT
North Little Rock Auto Salvage - Removal Polrep



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region VI

Subject: POLREP #7
NLRSY - Responsible Party Phase 2 Activities
North Little Rock Auto Salvage
A6R3
North Little Rock, AR
Latitude: 34.7585005 Longitude: -92.2262171

To:
From: Mike McAteer, OSC
Date: 5/27/2016
Reporting Period: December 12, 2015 to April 9, 2016

1. Introduction

1.1 Background

Site Number:	A6R3	Contract Number:	
D.O. Number:		Action Memo Date:	
Response Authority:	CERCLA	Response Type:	PRP Oversight
Response Lead:	PRP	Incident Category:	Removal Action
NPL Status:	Non NPL	Operable Unit:	
Mobilization Date:	10/6/2015	Start Date:	10/7/2015
Demob Date:		Completion Date:	
CERCLIS ID:	ARN000607042	RCRIS ID:	
ERNS No.:		State Notification:	
FPN#:		Reimbursable Account #:	

1.1.1 Incident Category

Time Critical Removal Action - RP-lead

1.1.2 Site Description

The North Little Rock Auto Salvage site is located at 600 Dixie Street in North Little Rock, Arkansas. This site was a former vermiculite exfoliation facility which was operated by the W.R. Grace Corp. from 1966 to 1986. This Site was assessed by EPA region 6 in multiple phases over the period of 2011 to 2013, as part of an Agency-wide initiative to investigate current and former vermiculite facilities. This site received approximately 85,000 tons of vermiculite ore from the W.R. Grace vermiculite mine in Libby, Montana. As a result of soil sampling conducted by EPA in July 2012, as well as Activity-Based Sampling (ABS) conducted in June 2013, several residential properties (i.e., "Lots") located along Dixie Lane were determined to contain levels of asbestos requiring removal. This includes various portions of Lot 9 (commercial) and the front yards of (residential) Lots 40, 42 and 55. Following negotiations with W.R. Grace, and an executed Administrative Order on Consent (AOC), W.R. Grace agreed to conduct additional ABS in the backyards of Lots 40, 42 and 55 and to remove soil from the impacted properties, followed by

confirmation soil sampling, additional ABS and site restoration. This removal work in the residential area south of the former exfoliation site is referred to as Phase 1 under the AOC.

Prior sampling on-site and around the main building was also conducted by EPA up to 2013. Several on-site areas were identified as requiring excavation and disposal of impacted soil, however additional sampling and assessment of on-site areas and surrounding properties was recommended. The Phase 2 activities were meant to further evaluate conditions on the former site, as well as on several Lots comprising the following: Lot 0 which is the former NLRSY site, Lot 1 which is to the north and owned by Union Pacific Railroad, Lots 2 and 3 which are located to the east/southeast and are active commercial properties, Lot 8 to the west/southwest which is vacant wooded land, Lot 12 to the west which is vacant wooded land and Lots 23 and 24 to the northwest which are land plots owned by the city of North Little Rock and Entergy respectively.

During Phase 2 activities, the RP assessed and/or sampled soil from over 200 grids on the Lots described above and analyzed the resulting soil for Libby asbestos using CARB 435. The RP also conducted activity-based sampling (ABS) at 20 locations on or around the site and directly along/on the railroad tracks and collected air samples which were analyzed for Libby asbestos through the ISO 10312 Method by Transmission Electron Microscope (TEM). Lastly, during Phase 2, EPA and Grace/OTO also conducted an assessment of the main on-site building on the NLRSY (Lot 0) property followed by sampling of dust present in the building via Micro-vac and analysis of the resulting air cassettes via ISO 10312. Of the approximately 30 samples collected, two samples/locations were deemed to be impacted with Libby asbestos.

Based on the soil, ABS (air) and Micro-vac (air) samples collected during the Phase 2 activities described above, a Phase 3 Removal Action will be conducted with an anticipated start date of June 1, 2016.

1.1.2.1 Location

The Phase 2 activities for the NLRSY site comprised several activities meant to further evaluate conditions on the former site, as well as on several "Lots" adjacent to the site in the western, northern and eastern directions. The Lots comprise the following: Lot 0 which is the former NLRSY site, Lot 1 which is to the north and owned by Union Pacific Railroad, Lots 2 and 3 which are located to the east/southeast and are active commercial properties, Lot 8 to the west/southwest which is vacant wooded land, Lot 12 to the west which is vacant wooded land and Lots 23 and 24 to the northwest which are land plots owned by the city of North Little Rock and Entergy respectively. These Lots are bounded by Range Line Avenue to the west, to Sam Evans Drive to the north and to Dixie Street to the east, and also bounded to the south by the UP owner railroad tracks.

1.1.2.2 Description of Threat

As a result of the soil sampling previously conducted on-site (Lot 0), it was determined that several areas were impacted by asbestos either in soils at levels at or above 0.25%. In addition, it was determined that additional soil, ABS and indoor/Micro-vac samples were required in other areas of Lot 0 and in the nearby properties to fully assess whether Libby asbestos exists at concentrations warranting removal or other action. The target screening levels of 0.001 structures per cubic centimeter (s/cc) for commercial properties (Lots 0, 1, 2, 3, 8, 12, 23 and 24) applies. The target screening levels were generated through a site-specific risk assessment completed by EPA.

2. Current Activities

2.1 Operations Section

2.1.1 Narrative

2.1.2 Response Actions to Date

The consultant to the RP, OTO, along with EPA and START mobilized to the site on December 11, 2015 to conduct Phase 2 activities. The Phase 2 activities for the NLRSY site comprised several activities meant to further evaluate conditions on the former site, as well as on several "Lots" adjacent to the site in the western, northern and eastern directions. The Lots comprise the following: Lot 0 which is the former NLRSY site, Lot 1 which is to the north and owned by Union Pacific Railroad, Lots 2 and 3 which are located to the east/southeast and are active commercial properties, Lot 8 to the west/southwest which is vacant wooded land, Lot 12 to the west which is vacant wooded land and Lots 23 and 24 to the northwest which are land plots owned by the city of North Little Rock and Entergy

respectively. In prior sampling and assessment work conducted by EPA, only Lot 0 locations were sampled, although several areas were visually evaluated. The historic EPA sampling identified several areas on Lot 0 that included soil impacted (as determined through CARB 435 analysis for Libby asbestos in soil) either with Trace ($< 0.25\%$) amounts of Libby asbestos, or greater (as defined as either 0.25% to 1% , or greater than 1% Libby asbestos). It was determined that soil with Libby asbestos concentrations greater than 0.25% would be removed, while those defined as having trace concentrations of Libby asbestos would be further evaluated. In addition, W.R. Grace as the Responsible Party (RP) was directed to conduct additional assessment of the soil and site conditions on the adjacent Lots defined above.

As a result, the RP proposed Phase 2 activities to assess the conditions on and around the site. This included defining a "Grid" system along the entire periphery which extended from Range Line Avenue to the west, to Sam Evans Drive to the north and to Dixie Street to the east, and also bounded to the south by the UP owner railroad tracks. This Grid system included derivation of grids with dimensions of 100 feet by 100 feet along the majority of this area, compressing down to grids with dimensions of 50 feet by 50 feet closer in to the location of the former exfoliation facility. The grids would all be assessed for asbestos visually, with approximately 20% of the 100 foot square grids also having soil samples collected for CARB 435 analysis, while all of the 50 foot square grids were also visually assessed and soil samples were collected from all of the grids. The results of the visual assessment did not indicate the presence of asbestos, or vermiculite, except for those grids closer to the former exfoliation facility and in Lot 0 and Lot 8. The same pattern was noted with the soil analytical results as much of the site (Lot 0) and some of the eastern portion of Lot 8 also had Libby asbestos detected in the resulting soil samples. The areas where impacted soils were observed at "Trace" levels or at levels greater than 0.25% would also require excavation and disposal. With approval of the railroads, grids that overlapped the railroad tracks were also assessed and sampled and visual or analytical results indicating the presence of Libby asbestos in the soil also appears limited to the Lot 0 and Lot 8 areas.

Following the direct assessment and soil sampling described above, the RP also conducted activity-based sampling (ABS), with oversight by EPA, at 20 locations on or around the site and directly along/on the railroad tracks. Where possible, ABS was conducted in multiple areas on each Lot. All ABS samples were comprised of only air samples which were analyzed for Libby asbestos through the ISO 10312 Method by Transmission Electron Microscope (TEM). The ABS included conducting two events comprised of either raking, ATV or weed-whacking, or a combination thereof to further assess whether Libby asbestos might be present in these areas and could be mobilized through or during the ABS activities conducted. Out of the 20 ABS events conducted, four (4) resulted in detection of Libby asbestos above the action level of 0.001 structures per cubic centimeter (s/cc), and as a result have also driven the addition of excavation of soil from several additional grids in Lot 8 and Lot 0 that did not meet the requirements from the CARB 435 analysis regarding the percent of Libby asbestos present to warrant removal.

In addition to the soil and ABS sampling conducted as key elements of the Phase 2 site activities, EPA and Grace/OTO also conducted an assessment of the main onsite building on the NLRSY (Lot 0) property. This multi-story concrete structure had not been previously evaluated and a visual assessment was conducted during Phase 2 with the current owner's consent. During this visual assessment, a large volume of used office furniture was being stored by the current owner on the first floor of the building and various auto parts remained on the second floor as a result of the prior owner's use as an auto salvage facility. The structure of the building was noted to be in good condition; however the majority of the windows were broken. In an effort to assess whether Libby asbestos might be present in the accumulated dust in the building, the RP directed sampling of the dust via Micro-vac and analysis of the resulting air cassettes via ISO 10312. Of the approximately 30 samples collected, two samples/locations were deemed to be impacted with Libby asbestos at concentrations which require further action (i.e., greater than 5,000 structures per cc).

Based on the soil, ABS (air) and Micro-vac (air) samples collected during the Phase 2 activities described above, the site will require cleanup and removal of soil as well as cleaning parts of the building during a Phase 3 Removal Action. The extent of the Phase 3 activities is currently estimated to involve the removal of approximately 15,000 tons of asbestos-contaminated soil from the site (Lot 0) and Lot 8 areas, as well as power-washing of the concrete surrounding the building, and cleaning or abatement of several portions of the building interior, along with disposal of the current contents from these areas. The Phase 3 Work Plan is currently being completed with an anticipated start date for Phase 3 activities of June 1, 2016.

All contract personnel demobilized following Phase 2 site activities on April 6, 2016.

2.2 Planning Section

2.2.1 Anticipated Activities

Phase 3 activities will involve the excavation of all areas of asbestos-contaminated soil from on and around the former exfoliation facility as discovered in Phase 2 activities. Phase 3 will also include cleaning/abatement of the on-site building and power washing of the adjacent concrete areas. This work is currently projected to begin in June 2016.

2.3 Logistics Section

No information available at this time.

2.4 Finance Section

No information available at this time.

2.5 Other Command Staff

2.5.1 Safety Officer

W.R. Grace and their Consultant OTO, or applicable subcontractors, are performing the role of Safety Officer for the RP-led Removal Action. EPA and START developed complementary Health and Safety Documentation or Directives, but also adhered to the H&S policies (e.g., work zones) defined by OTO

2.6 Liaison Officer

2.7 Information Officer

2.7.1 Public Information Officer

Bill Little of EPA's Public Information Office is the PIO

2.7.2 Community Involvement Coordinator

3. Participating Entities

3.1 Unified Command

Not Applicable

3.2 Cooperating Agencies

Arkansas Department of Environmental Quality (ADEQ)
Arkansas Department of Emergency Management (ADEM)
Arkansas Department of Health (ADH)

4. Personnel On Site

Personnel and Affiliations

- W.R. Grace is represented on-site by personnel from OTO, and/or their subcontractor firm Abscope.
- EPA is represented by On-Scene Coordinator (OSC) Mike McAteer. OSC McAteer has assigned a Representative from START Contractor CSS-Dynamac (John Koehnen) to conduct Oversight of the RP-Led Removal Action activities and to document or advise the OSC as appropriate.

5. Definition of Terms

No information available at this time.

6. Additional sources of information

6.1 Internet location of additional information/report

Not Applicable

6.2 Reporting Schedule

Per the AOC, W.R. Grace and OTO are required to provide a Bi-weekly Progress Report to the OSC, START and other interested parties. START also develops and distributes (upon OSC approval) a Periodic Progress Report which summarizes the PRP and START activities conducted as well as anticipated along with a summary of any pertinent analytical data and photo documentation

7. Situational Reference Materials

No information available at this time.